

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

WYNDHOLME VILLAGE, LLC, *et al.* *

Plaintiffs and Counterdefendants *

v. * CIVIL ACTION NO. L01-3809

NADIF OF WYNDHOLME, LLC, *et al.* *

Defendants and Counterplaintiffs *

*

* * * * *

ANSWERS OF DEFENDANT QUINN TO INTERROGATORIES

John R. "Jack" Quinn ("Quinn"), defendant and counterplaintiff, by its undersigned attorneys, answers the Interrogatories propounded by plaintiffs and counterdefendants, Wyndholme Village LLC, James M. Lancelotta and Katherine A. Lancelotta, as follows:

A. PRELIMINARY STATEMENTS

1. The information supplied in these answers is not based solely upon the knowledge of the person executing them on behalf of the defendant, but includes knowledge of other employees, agents, representatives, and attorneys (except for privileged information) of the defendant.

2. The word usage and sentence structure is that of the attorneys who prepared these answers, and the language does not purport to be the exact language of the executing party.

3. The defendant's investigation of the relevant facts applicable to this case is continuing. Defendant reserves the right to supplement or modify these

the substance of the findings and opinions to which the expert(s) is/are expected to testify and a summary of the grounds for each opinion.

ANSWER TO INTERROGATORY NO. 9: Chris Rosenthal, CPA, Ellin & Tucker

Chartered, 100 S. Charles Street, Baltimore, MD 21201. Defendant reserves the right to supplement or amend this answer.

INTERROGATORY NO. 10: Identify all lay witnesses whom you expect to call at trial who will render testimony in the form of opinions or inferences and for each such witness, state the subject matter on which the witness is expected to testify and each fact and assumption upon which the witness relied in formulating the opinion.

ANSWER TO INTERROGATORY NO. 10: The defendant objects to this interrogatory on grounds that it is overly broad and to the extent that it seeks the discovery of information that is (i) beyond the scope of discovery permitted under the Federal Rules of Civil Procedure, (ii) protected by the attorney-client privilege, and (iii) protected under the attorney work product doctrine. Without waiving these objections, the plaintiff states that no determination has yet been made as to persons to be called as witnesses at trial. The defendant will comply with any pretrial order that requires the disclosure of trial witnesses. The defendant further states that the Scheduling Order does not require it to identify such lay witnesses.

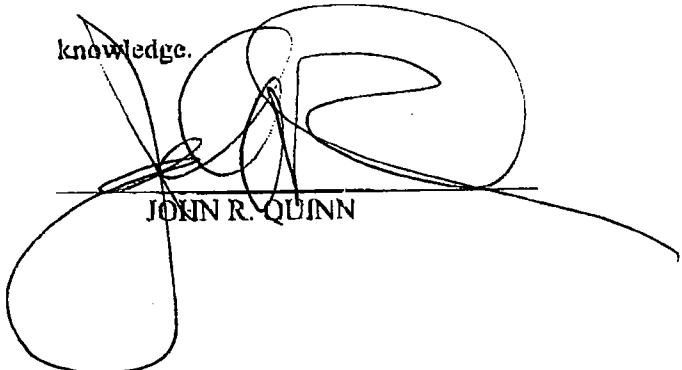
INTERROGATORY NO. 11: State whether you have ever been convicted of a crime since you have been 18 years of age, providing in your answer the crime, date of conviction and court.

ANSWER TO INTERROGATORY NO. 11: I pled guilty in June 1987 in New York to a misdemeanor.

INTERROGATORY NO. 12: Identify in its entirety each specific misrepresentation that you contend James Lancelotta made to you, including specifically what you contend was false, and the date of the misrepresentation, the persons present during the misrepresentation, the person who received the misrepresentation and whether the misrepresentation was oral or reduced to some writing or other tangible medium.

AFFIRMATION

The undersigned affirms and declares upon the penalties of perjury that the foregoing answers to interrogatories are accurate and true to the best of his knowledge.



JOHN R. QUINN

Date: JAN. 6, 2003

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